



March 12, 2018

Mike Robinson  
Bureau of Land Management  
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Casper, WY 82604  
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RE: Converse County Oil and Gas Project - Draft Environmental Impact Statement (DEIS)

Dear Mr. Robinson –

Thank you for the opportunity to comment. Wyoming Wildlife Federation represents 5,000 sportsmen and sportswomen working to conserve wildlife and outdoor opportunities throughout the state of Wyoming. Our members recreate and live within this Converse County oil and gas project area.

WWF supports responsible oil and gas development. We believe in balancing our natural resources for development and for continued health and viability of wildlife habitat as well as hunting and fishing opportunities.

The DEIS includes three alternatives – a no action alternative (Alternative A) and Alternatives B and C that call for the development of 5,000 wells. Alternative B notes 1,500 well pads while Alternative C notes a 938 well pads, thereby equaling a reduced surface disturbance. WWF recommends Alternative C.

As the Bureau of Land Management drafts the Final Environmental Impact Statement WWF recommends the following:

- Water
  - Identify an in-depth and clear plan for how the water will be developed, used, stored, and disposed of after use.
  - Water is a finite resource that needs to be conserved and kept clean of pollutants. Identify the plans for maintaining a healthy water resource and how effectively or not effectively the water will be used.
  - This project notes three billion gallons of produced water will be disposed of every year. Where will they receive the water? How will it be disposed of exactly? How often will the water be tested for hydrocarbons and flow back



fracking fluids? What is the process for testing the water? Who will monitor all of the water use and storage of?

- Wildlife
  - Greater sage-grouse (GSG) core and non-core areas exist within the project area. Maintain GSG timing stipulations during drilling and the completion stage.
  - Use V.4 map of GSG core areas in the preferred alternative.
  - Development in core and non-core areas need to comply with the Wyoming sage-grouse executive order and mitigation framework.
  - Use phased development to avoid unnecessary wildlife habitat fragmentation.
  - Enhance existing infrastructure and engineer the new road system so that the fewest number of new roads are needed. The more roads constructed the larger the surface disturbance footprint. Minimize the footprint throughout the project area.
  - Gather baseline wildlife data prior to construction.
  - We agree with covering all drilling and production pits and tanks for the safety of sage-grouse and other birds.
  - Set a speed limit and travel use protocol to reduce vehicle/wildlife collisions.
- Invasive Species
  - Control the spread of invasive non-native plant species via an identified protocol to be used by each energy company and contractor.
  - The continued spread of invasive species is likely; therefore, a plan is necessary to reduce that spread.
- Reclamation
  - Keep top soil that is removed for reclamation purposes after development stage and the final production stage.
- Cumulative Impacts
  - The overall suggested cumulative impacts associated with this project, the other planned projects, and existing energy development in Converse County is concerning. Incorporate phased development to reduce the overall impact to wildlife, habitat, and other multiple-uses. Habitat fragmentation is going to occur with this project, however, the scale of that fragmentation needs to be determined by the BLM within the Environmental Impact Study.



- Site-specific analysis for development tiered with the EIS will be limited given the split estate ownership. Identify steps to reduce surface disturbance in the preferred alternative.

If you have any questions or would like to discuss our comments further, please don't hesitate to contact us.

Sincerely,

Joy Bannon  
Field Director